

REMARKS

The Examiner objected to claim 5 for employing “a portion” at the second instance of the word “portion,” and Applicant has entered the requested correction so that, in the second instance, it reads “the portion.”

The Examiner has rejected independent claim 1 in three separate instances as being anticipated by Ophardt ‘989, Tucker ‘753, and Devlin ‘204. Applicant has amended claim 1 as supported by the specification background and body, and particularly page 10, lines 8-19 to indicate that the universal collar key claimed is employed for insertion within a housing of a soap dispenser that has a keying system including a keyplate having a keyway to receive a complementary shaped collar key associated with an “intended container.” It will be appreciated from this argument and the body of the specification that this “intended container,” is the container bearing the appropriate collar key to engage with the keyway of the keyplate. The claimed universal collar key bypasses the keying system of the soap dispenser. None of the cited references satisfy this claim limitation or even contemplate its structure and function. Reconsideration of independent claim 1 and all claims depending therefrom (claims 2-11) is respectfully requested.

Independent claim 12 and its dependent claim 13 have been indicated as being allowed.

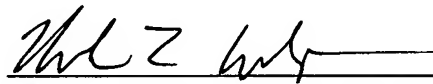
Independent claim 14 and its dependent claim 15 have been canceled.

Independent claim 16 has been rejected as being anticipated by Devlin ‘204. In response, Applicant notes that Devlin does not teach a collar secured to a container, as claimed in claim 16. Additionally, the portion of Devlin ‘204 that the Examiner alleges as being a “projecting hold” does not prevent rotation of the collar since the collar in Devlin is unable to rotate due to its shape, not due to any alleged projecting hold. Particularly, the alleged “collar” in Devlin is rectangular in cross-section, and engages the walls of the dispenser in such a manner that it could not rotate whether or not the alleged holds were employed. Finally, Applicant notes that the Examiner cites to an unnumbered and undiscussed portion of Devlin ‘204 as being the “keyplate,” and there is certainly no indication in Devlin ‘204 that the element that the Examiner points to actually is a keyplate. The Examiner simply looks to Devlin and chooses any element therein that he can now consider in hindsight, after seeing Applicant’s

claims as satisfying a claim element regardless of the fact that the elements are not taught as cited by the Examiner, and, in some instances, not mentioned in Devlin at all. Finally, as already mentioned, the alleged collar (item 22 in the figures) of Devlin '204 is not secured to a container as required by claim 16.

In light of the foregoing, all independent claims are in condition for allowance, as are the claims depending therefrom. Reconsideration is therefor respectfully requested, and a Notice of Allowance is earnestly solicited. Should the Examiner wish to discuss any of the foregoing in greater detail, the undersigned attorney would welcome a telephone call.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read 'Mark L. Weber', is written over a horizontal line.

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